

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TIMOTHY STAUB)	CASE NO. 1:24 CV 1868
)	
Plaintiff,)	JUDGE DAVID A. RUIZ
)	
vs.)	REQUEST FOR ENTRY OF
)	DEFAULT PURSUANT TO FED. R.
LOCUS MANAGEMENT, LLC, <i>et al.</i>)	CIV. P. 55(a)
)	
Defendants.)	

Now comes Petitioner/Plaintiff Timothy G. Staub (“Staub”), by counsel, who hereby requests that the Clerk of this Court make an entry of default against Defendants Locus Management, LLC and Locus Solutions, LLC pursuant to Rule 55(a) of the Federal Rules of Civil Procedure. Plaintiff submits the Declaration of Attorney Peter C. Mapley as Exhibit 1 hereto in support of his request.

Defendants were properly served with a copy of Plaintiff’s Application for Confirmation of Arbitration Award and had until December 2, 2024 to answer or otherwise move.

Plaintiff filed his Application for Confirmation on October 25, 2024. (ECF 1, Ex. 1). Service on each Defendant was executed on November 9, 2024, as evidenced on the Court’s docket and United States Postal Service certified mail green cards attached hereto as Exhibits 2 and 3. (ECF 3; ECF 4; Ex. 1; Ex. 2; Ex. 3).

Service on each Defendant was addressed to its Ohio statutory agent. (Ex. 1).

Neither Defendant is an agency of the United States. (Ex. 1).

Defendants had until Monday, December 2, 2024 to file an answer or motion under Fed. R. Civ. P. 12(a)(2) or (3).

To date, the Defendants have failed to enter an appearance, plead, or otherwise defend within the time limits provided for in the civil rules.

Accordingly, Plaintiff requests that the Clerk make an entry of default against Defendant pursuant to Civ. R. 55(a).

Respectfully submitted,

s/ Peter C. Mapley
Peter C. Mapley (0092359)
SOBEL, WADE & MAPLEY, LLC
65 Erieview Plaza, #610
Cleveland, Ohio 44114
(216) 223-7213
mapley@swmlawfirm.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that the foregoing is being filed this 5th day of December 2024 via the Court's electronic filing system and that copies of this motion and all exhibits are being mailed via United States Postal Service certified mail upon:

LOCUS MANAGEMENT, LLC
c/o CT Corporation System
4400 Easton Commons, Suite 125
Columbus, Ohio 43219

-and-

LOCUS SOLUTIONS, LLC
c/o CT Corporation System
4400 Easton Commons, Suite 125
Columbus, Ohio 43219

s/ Peter C. Mapley

Peter C. Mapley (0092359)